

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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KIM MOORE,

Plaintiff,

Case No.: 23-cv-4837

-against-

HADESTOWN BROADWAY LIMITED LIABILITY
COMPANY,

**DECLARATION OF
JOSEPH MYERS**

Defendant.

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I, Joseph Myers, an attorney licensed by the State of New York and admitted to practice in the United States District Court of the Southern District of New York, do hereby certify the following:

1. I am an Associate with the firm, Phillips & Associates, PLLC, the attorneys for Plaintiff, Kim Moore, ("Plaintiff") in the above-entitled action, and as such, am fully familiar with the facts and circumstances contained herein.
2. I submit this Declaration in opposition to Defendant Hadestown Broadway Limited Liability Company's ("Defendant") Motion to Dismiss.
3. Attached hereto as Exhibits are the following:
 - a. Exhibit A – Redlined Version of Plaintiff's Proposed Second Amended Complaint; and
 - b. Exhibit B – Complaint in the Matter of *Dominguez v. FS I Los Angeles, LLC*, bearing Case Number 15-cv-9683 in the Central District of California.

WHEREFORE, for the reasons set forth in accompanying Memorandum of Law, Plaintiff respectfully requests that the Court deny Defendant's Motion to Dismiss.

Dated: Garden City, New York
September 5, 2023

Respectfully Submitted,

/s/ Joseph Myers

Joseph Myers, Esq.

Phillips & Associates, PLLC

Attorneys for Plaintiff

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